

## **REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1-10 and 18-20 are pending in the application. Claims 1, 6 and 18 are independent claims. Claims 1, 6 and 18 are amended hereby. Applicant respectfully traverses the rejections of the current Office Action.

### **Claim Rejections Under 35 U.S.C. § 103**

**Claims 1-2, 4-6, and 9-10** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Firester et al., U.S. Patent No. 6,622,241 B1 (hereinafter "Firester") in view of Li et al. "Building and Using A Scalable Display Wall System", 2000 IEEE (hereinafter "Li"). **Claims 3, 7 and 18-20** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Firester, Li and Ellis et al., U.S. Patent No. 4,562,450 (hereinafter Ellis). **Claims 12-13** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Firester, Ellis, Cok et al., U.S. Patent No. 6,999,045 B2 (hereinafter "Cok") and Sakai et al., U.S. Patent No. 5,680,525 (hereinafter "Sakai"). **Claims 15-16** stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Firester, Ellis, Cok, Sakai, Li and Nishida, U.S. Patent No. 6,502,107 (hereinafter "Nishida"). **Claim 8** stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Firester, Li, Ellis, and further in view of Sakai. Applicant respectfully traverses these rejections.

The rejections of the canceled claims are moot. Therefore, Applicant will not discuss those rejections herein. The cancelation and amendments to the claims have been made solely to expedite the prosecution of the instant Application.

**Amended independent claim 1** recites:

A method comprising:  
    *advertising, from an intermediate computer coupled to a plurality of small displays, the availability of a large display, the large display comprising the plurality of small displays, but advertised as a contiguous large display;*  
    receiving video data over a network from a network computer, the video data formatted for display on the large display;  
    *receiving configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a small display that is part of the large display;*  
    *reformatting the video data on the intermediate computer for display on a number of the plurality of small displays that are part of the large display; and*  
    distributing reformatted video data from the intermediate computer to at least some of the small displays.  
(Emphasis added.)

Applicant carefully considered the texts of Firester and Li and was unable to find any disclosure that suggests at least "receiving configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a small display that is part of the large display" and "reformatting the video data on an intermediate computer for display on a number of the small displays that are part of the large display," as recited in the above-reproduced claim 1. Moreover, Applicant was unable to find any disclosure that suggests at least "advertising, from an intermediate computer coupled to a plurality of small displays, the availability of a large display, the large display comprising the plurality of small displays, but advertised as a contiguous large display," as recited in the above-reproduced claim 1.

Firester discloses a display system 100 that includes a display screen 102 that displays an image by way of a plurality of image generating devices 110, 120, 130 and 140. (See *Fig. 2; column 3, lines 19-21 of Firester.*) The image generating devices 110, 120, 130 and 140 are interfaced with image processors IP1, IP2, IP3, and IP4, respectively. And the image processors IP1, IP2, IP3, and IP4 are each connected to a single image server 106. (*Column 4, lines 14-30.*)

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes multiple computers that each drive a projection device. (See *Figure 1 of Li.*)

However, the Firester and Li combination does not suggest a computer to receive "configuration information individually from a plurality of clients," as is recited in claim 1. Rather, each image processor IP1, IP2, IP3, and IP4 does its own reformatting of the video data for display on the display screen 102. Firester explicitly discloses this fact. That is, Firester states that

"[i]mage processor IP1 processes the image data [from image server 106] for the portion of the image produced by image generator 110, such as by *reformatting, decompressing, rendering, decoding, and predistorting*, and sends that modified image data to image generator 110 on a pixel-by-pixel basis." (See *column 4, lines 23-28.*) The other image processors IP2, IP3 and IP4 behave in the same manner as the image processor IP1.

Thus, because the Firester and Li combination suggests that each of the image processor IP1, IP2, IP3, and IP4 is responsible for its own rendering and display, it follows that those image processors IP1, IP2, IP3, and IP4 would not distribute "configuration information" that enables "an intermediate computer" to reformat video data, as is claimed in claim 1.

The Office maintains that the image server 106 reformats image data received from an image source. But in fact, the image server 106 merely "provides image data received from an image source... to each of the image processors IP1, IP2, IP3 and IP4." (See column 4, line 14 and line 23; Firester.) Therefore, the Firester and Li combination does not suggest "reformatting the video data on *an intermediate computer* for display on a number of the small displays that are part of the large display," as recited in the above-reproduced claim 1. Instead, as is discussed above, reformatting is performed by the individual image processors IP1, IP2, IP3, and IP4.

Additionally, Applicant has carefully considered the disclosures of all of the patent documents relied upon by the Examiner and found nothing in those documents that discloses or suggests the claim 1 recitation: "advertising, from an intermediate computer coupled to a plurality of small displays, the availability of a large display, the large display comprising the plurality of small displays, but advertised as a contiguous large display."

Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 1.

**Dependent claims 2 and 4-5** depend from claim 1. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 1, are not suggested by the combination relied upon by the Office.

**Amended independent claim 6** recites:

A processor-readable medium storing processor-executable instructions configured for:

*advertising, from an intermediate computer coupled to a plurality of small displays, the availability of a large display, the large display comprising the plurality of small displays, but advertised as a contiguous large display;*

*receiving, at the intermediate computer, configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a separate small display that is part of the large display;*

receiving video data over a computer network at the intermediate computer, the video data configured for display on the large display;

reconfiguring the video data for display on the small displays in accordance with the configuration information; and

*sending reconfigured video data from the intermediate computer to the small displays. (Emphasis added.)*

Applicant carefully considered the texts of Firester and Li and was unable to find any disclosure that suggests at least "receiving, at an intermediate computer, configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a separate small display that is part of a large display" and "sending reconfigured video data from the intermediate computer to the small displays," as recited in the above-reproduced claim 6. Moreover, Applicant was unable to find any disclosure that suggests at least "advertising, from an intermediate computer coupled to a plurality of small displays, the availability of a large display, the large display comprising the plurality of small displays, but advertised as a contiguous large display," as recited in the above-reproduced claim 6.

Firester discloses a display system 100 that includes a display screen 102 that displays an image by way of a plurality of image generating devices 110, 120, 130 and 140. (See *Fig. 2; column 3, lines 19-21 of Firester.*) The image generating devices 110, 120, 130 and 140 are interfaced with image processors IP1, IP2, IP3, and IP4, respectively. And the image processors IP1, IP2, IP3, and IP4 are each connected to a single image server 106. (*Column 4, lines 14-30.*)

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes multiple computers that each drive a projection device. (See *Figure 1 of Li.*)

However, the Firester and Li combination does not suggest a computer to receive "configuration information respectively from a plurality of clients, each of the received configuration information including attribute information associated with a separate small display that is part of a large display," as is recited in claim 6. Rather, each image processor IP1, IP2, IP3, and IP4 does its own reformatting of the video data for display on the display screen 102. Firester explicitly discloses this fact. That is, Firester states that

"[i]mage processor IP1 processes the image data [from image server 106] for the portion of the image produced by image generator 110, such as by *reformatting, decompressing, rendering, decoding, and predistorting*, and sends that modified image data to image generator 110 on a pixel-by-pixel basis." (See *column 4, lines 23-28.*) The other image processors IP2, IP3 and IP4 behave in the same manner as the image processor IP1.

Thus, because the Firester and Li combination suggests that each of the image processor IP1, IP2, IP3, and IP4 is responsible for its own rendering and display, it follows that those image processors IP1, IP2, IP3, and IP4 would not distribute

"configuration information" that enables "an intermediate computer" to "send" reconfigured video data, as is claimed in claim 6.

The Office maintains that the image server 106 reformats image data received from an image source. But in fact, the image server 106 merely "provides image data received from an image source... to each of the image processors IP1, IP2, IP3 and IP4." (See *column 4, line 14 and line 23; Firester.*) Therefore, it follows that the Firester and Li combination does not suggest "sending reconfigured video data from the intermediate computer to the small displays," as recited in the above-reproduced claim 6.

Additionally, Applicant has carefully considered the disclosures of all of the patent documents relied upon by the Examiner and found nothing in those documents that discloses or suggests the claim 6 recitation: "advertising, from an intermediate computer coupled to a plurality of small displays, the availability of a large display, the large display comprising the plurality of small displays, but advertised as a contiguous large display."

Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 6.

**Dependent claims 9 and 10** depend from claim 6. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 6, are not suggested by the combination relied upon by the Office.

**Amended independent claim 18** recites:

A large display configuration computer comprising:  
*advertise the availability of a large display, the large display comprising a plurality of small display devices, but advertised as a contiguous large display;*  
receive, over a computer network, video data formatted for the large display;  
*receive configuration data from a plurality client computers each having an associated display device, the configuration data received from each client computer including a physical location and a display resolution of the display device associated therewith; and*  
*reformat the video data formatted for the large display for display across the display devices associated with the plurality of client computers, the reformatting of the video data for the large display including dividing the video data into distinct video data portions that may be individually rendered on the display devices associated with the plurality of client computers.* (Emphasis added.)

Applicant carefully considered the entire texts of Firester, Li and Ellis and was unable to find any disclosure that suggests at least the "receive," "reformat" and "advertise" functionality associated with the claimed "configuration computer" of claim 18.

Firester discloses a display system 100 that includes a display screen 102 that displays an image by way of a plurality of image generating devices 110, 120, 130 and 140. (See *Fig. 2; column 3, lines 19-21 of Firester.*) The image generating devices 110, 120, 130 and 140 are interfaced with image processors IP1, IP2, IP3, and IP4, respectively. And the image processors IP1, IP2, IP3, and IP4 are each connected to a single image server 106. (*Column 4, lines 14-30.*)

Li discloses a system that provides a large-display using several conventional components. The system includes a display cluster that includes



multiple computers that each drive a projection device (*See Figure 1 of Li*). Ellis discloses a data management system for one or more large plasma gas panel displays 11 (*See Abstract of Ellis*).

However, the Firester, Li and Ellis combination does not suggest a module to "receive configuration data from a plurality client computers each having an associated display device, the configuration data received from each client computer including a physical location and a display resolution of the display device associated therewith," as is recited in claim 18. Rather, each image processor IP1, IP2, IP3, and IP4 does its own reformatting of the video data for display on the display screen 102. Firester explicitly discloses this fact. That is, Firester states that

"[i]mage processor IP1 processes the image data [from image server 106] for the portion of the image produced by image generator 110, such as by *reformatting, decompressing, rendering, decoding, and predistorting*, and sends that modified image data to image generator 110 on a pixel-by-pixel basis." (*See column 4, lines 23-28.*) The other image processors IP2, IP3 and IP4 behave in the same manner as the image processor IP1.

Thus, because the Firester, Li and Ellis combination suggests that each of the image processor IP1, IP2, IP3, and IP4 is responsible for its own rendering and display, it follows that those image processors IP1, IP2, IP3, and IP4 would not distribute "configuration data" that enables a "configuration computer" to "reformat" video data, as is claimed in claim 18.

Additionally, Applicant has carefully considered the disclosures of all of the patent documents relied upon by the Examiner and found nothing in those documents that discloses or suggests the claim 18 recitation: "advertise the availability of a large display, the large display comprising a plurality of small display devices, but advertised as a contiguous large display."

Therefore, for at least the reasons stated above, Applicant respectfully requests the Office to reconsider and withdraw the rejection of claim 18.

**Dependent claims 19-20** depend from claim 18. The rejection with regard to these claims should be withdrawn by virtue of the dependency. Moreover, these claims recite features that, when taken together with those of claim 18, are not suggested by Firester, Li and Ellis.

**Claim 3** depends from claim 1 and hence incorporates the features of claim 1. As noted above, Firester and Li fail to suggest the limitations of claim 1. The added disclosure of Ellis does not remedy those shortcomings, nor does the rejection make any assertion to that effect. Therefore, the proposed combination of Firester, Li and Ellis fails to suggest the recitation of claim 1, from which claim 3 depends. Moreover, this dependent claim recites features that, when taken together with those of claim 1, are not rendered obvious by the proposed combination.

**Claim 7** depends from claim 6 and hence incorporates the features of claim 6. As noted above, Firester and Li fail to suggest the limitations of claim 6. The added disclosure of Ellis does not remedy those shortcomings, nor does the rejection make any assertion to that effect. Therefore, the proposed combination of Firester, Li and Ellis fails to suggest the recitation of claim 6, from which claim 7 depends. Moreover, this dependent claim recites features that, when taken together with those of claim 6, are not rendered obvious by the proposed combination.

**Claim 8** depends from claim 6 and hence incorporates the features of claim 6. As noted above, Firester and Li fail to suggest the limitations of claim 6. The added disclosure of Ellis and Sakai does not remedy those shortcomings,

nor does the rejection make any assertion to that effect. Therefore, the proposed combination of Firester, Li, Ellis and Sakai fails to suggest the recitation of claim 6, from which claim 7 depends. Moreover, this dependent claim recites features that, when taken together with those of claim 6, are not rendered obvious by the proposed combination.

In accordance with the foregoing, Applicant respectfully requests reconsideration and withdrawal of the 35 U.S.C. § 103(a) rejections.

Conclusion

In accordance with the foregoing remarks, Applicant believes that the pending claims are allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact either of the attorneys listed below.

Respectfully Submitted,

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By: /Tim R. Wyckoff/  
David S. Lee  
Reg. No. 38,222

Tim R. Wyckoff  
Reg. No. 46,175  
Email: timw@spryip.com